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11 **UNITED STATES DISTRICT COURT**  
12 **DISTRICT OF NEVADA**

13 DESTINIE MULLEN, an Individual,

14 Plaintiff,

15 vs.

16 NUGENT, LLC, a Nevada limited liability  
17 company d/b/a GREAT CLIPS, DOES I -X;  
18 and ROE CORPORATIONS I -X.

19 Defendant.

**CASE NO.: 2:19-cv-01109-GMN-GWF**

**STIPULATION AND ORDER**  
**EXTEND REMAINING DISCOVERY**  
**DEADLINES**

**(THIRD REQUEST)**

20 The parties, Plaintiff DESTINIE MULLEN (“**Plaintiff**”) and Defendant NUGENT,  
21 LLC, a Nevada limited liability company d/b/a GREAT CLIPS (“**Defendant**”), by and through  
22 their respective attorneys of record, hereby stipulate and agree as follows:

23 1. That the close of Discovery currently set for November 24, 2020, be extended  
24 by a period of ninety (90) days, and become due on February 22, 2021 or as soon thereafter as  
25 the Court may allow:

26 2. That all other discovery deadlines be extended ninety (90) days;

27 3. That the Parties exchanged Initial Disclosures and written discovery requests;

28 4. That the Parties exchanged responses to the written discovery request;

5. That the Parties discussed Defendant amending their discovery responses and  
amended responses are anticipated to be forthcoming shortly;

1           6.       That the Parties discussed Plaintiff amending her complaint to include an  
2 additional defendant.

3           7.       Plaintiff's counsel was informed that a member of Defendant's law firm had  
4 been diagnosed as having the Coronavirus. Defendant's firm not only had to take the necessary  
5 time for recovery, but also had invest time in taking precautionary measures and ensuring no  
6 further spread. In turn, this has resulted in the necessity for additional time for case handling.

7           8.       Plaintiff's counsel and Defendants' counsel have been in contact regarding the  
8 suitability of extending discovery in this matter based upon the limitations imposed on all  
9 counsel and parties due to COVID-19 pandemic resurging as well as delays in amending  
10 discovery responses, which are needed before any meaningful depositions can take place.

11          9.       Both Plaintiff's and Defendant's counsel agree that an extension of the  
12 remaining discovery deadlines is warranted for this matter to be fully litigated on the merits and  
13 an extension is in the best interests of both the Parties and the Court.

14          10.      Plaintiff recently learned of a new party to this matter, and on October 27, 2020,  
15 Plaintiff promptly filed a Motion to Amend the Complaint (ECF 31). Defense counsel has no  
16 objection to Plaintiff's Motion, and as such, additional time is needed to Amend the Complaint  
17 and bring in the additional party.

18          11.      The Parties have the following depositions outstanding: Plaintiff and Person  
19 Most Knowledgeable for Defendant. The Parties have not taken those depositions because the  
20 Parties would prefer to have all parties added via the Amended Complaint and complete the  
21 exchange of written discovery before taking depositions. Without the amended Complaint and  
22 complete exchange of written discovery, the depositions will not be as meaningful.

23          12.      The parties are confident that with the additional time, that a resolution may be  
24 reached after the amended responses are provided and depositions are conducted.

25          13.      That good cause exists for the request for the Discovery deadline to be extended  
26 until February 22, 2021 for the above-specified reasons.

27          14.      All parties believe the requested extension is warranted under the current  
28 circumstances and will not result in undue delay in the administration of this cause.

1           15.     This is the third request for an extension of the Scheduling Order in this matter  
2 and is made in compliance with Local Rule 26.3.

3 Dated this 30 day of November 2020.

Dated this 30 day of November 2020.

4 **HKM Employment Attorneys LLP**

**TCM Law Firm**

5  
6 /s/ Jenny L. Foley

/s/ Thomas C. Michaelides

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9 *Attorney for Plaintiff*

*Attorney for Defendant*

10  
11 **ORDER**

12 IT IS SO ORDERED:

13   
14 UNITED STATES MAGISTRATE JUDGE

15 DATED: November 30, 2020